

UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America

v.

Case No. SA:24MJ920

Elizabeth Deleon, Angel Palomo, and Alicia Barbosa

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 15, 2024 through June 20, 2024 in the county of Bexar and Guadalupe in the Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*21 U.S.C. Section 841(a)(1),
846

Conspiracy to Possess with Intent to Distribute Methamphetamine

10 Years to Life Imprisonment, \$10 Million Fine, Min 5 Years
Supervised Release, \$100 Mandatory Special Assessment

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.DAVID CAMACHO (Affiliate) Digitally signed by DAVID CAMACHO (Affiliate)
Date: 2024.06.21 10:39:46 -05'00'*Complainant's signature*

Task Force Officer David Camacho

Printed name and title☐ Sworn to before me and signed in my presence.☒ Sworn to telephonically and signed electronically.Date: 6/21/24City and state: San Antonio, Texas*Judge's signature*

Elizabeth S. Chestney, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

Affidavit in Support of Criminal Complaint

- 1 . Affiant has been employed as a Deputy Sheriff with the Guadalupe County Sheriff's Office since 2006. Since 2011 Affiant has been assigned to the Guadalupe County Narcotics Division. Since 2018, Affiant has been assigned as a Task Force Officer with the Drug Enforcement Administration. During the course of Affiant's employment, he has been personally involved in numerous drug trafficking and money laundering investigations. Affiant has special training in the investigation of drug trafficking organizations, specifically communication exploitation, and drug trafficking patterns and techniques. Affiant has participated in this investigation and has thorough knowledge listed in this complaint.
- 2 . On May 15, 2024, DEA Group D54 [TAG] in conjunction with the Guadalupe County Narcotics Task Force [GCNTF], utilized a Confidential Source [Hereinafter referred to as CS] to conduct a narcotic transaction with Elizabeth DELEON. Prior to the transaction, the CS and Angel PALOMO telephonically arranged to meet and conduct the narcotic transaction at an address in Seguin, Guadalupe County, Texas, which is located in the Western District of Texas. Prior to the controlled meet, Agents/Officers established surveillance at the meet location. DELEON arrived at the meet location alone operating a blue Chrysler Town and Country van displaying TXLP#XXX-XXXX. During the meet, DELEON, on behalf of PALOMO, sold/delivered the CS approximately one-hundred and seventy-two [172] grams of a substance that field-tested positive for crystal methamphetamine. Agents took possession of the methamphetamine.
- 3 . Following the narcotic transaction, a GCNTF K9 Deputy conducted a traffic stop on DELEON who was driving the blue Chrysler Town and Country vehicle. During the traffic stop, the Deputy located and seized one [1] loaded Glock Gen 19 9 MM handgun SN#AFC0F050 from DELEON. DELEON was not arrested and released from the stop without incident.
- 4 . On May 21, 2024, agents worked with the CS to conduct another narcotics transaction. The CS and PALOMO telephonically arranged to meet and conduct the narcotic transaction at an address in Seguin, Guadalupe County, Texas. Prior to the controlled meet, Agents/Officers established surveillance at the meet location. Agents/Officers observed DELEON arrive to the meet location alone operating the same Chrysler Town and Country Vehicle as before. During the meet, DELEON sold/delivered the CS approximately one hundred and ninety-two [192] grams of crystal methamphetamine on behalf of PALOMO. Agents seized the substance, and it field-tested positive for methamphetamine.

5. On May 29, 2024, agents used the CS to conduct another narcotics transaction. The CS and PALOMO telephonically arranged to meet and conduct the narcotic transaction at an address in Seguin, Guadalupe County, Texas. Prior to the controlled meet, Agents/Officers established surveillance at the meet location. Agents/Officers observed Alicia BARBOSA arrive to the meet location operating a grey Dodge Durango which Affiant later learned is currently owned and utilized by DELEON. During the meet, BARBOSA sold/delivered the CS approximately five hundred and three [503] grams of crystal methamphetamine on behalf of PALOMO. Agents seized the substance, and it field-tested positive for methamphetamine. Agents/Officers surveilled BARBOSA as she departed the meet location. In doing so, Agents/Officers observed BARBOSA pick up PALOMO who was seen and positively identified walking around on foot in the area of the meet location.
6. On June 14, 2024, Officers obtained a search warrant from the Western District of Texas-San Antonio Division to search PALOMO's residence located at an address on Avondale in San Antonio, Texas.
7. On June 20, 2024, Officers set up surveillance at PALOMO's residence on Avondale in the early morning hours. Agents observe a maroon Honda passenger car drop off PALOMO and an unidentified woman and child. PALOMO was wearing a backpack. The unidentified woman and child are seen going into the Avondale residence, while PALOMO is seen walking to a run down, vacant-looking house a few houses down from his house on Avondale. Officers had observed several individuals sitting in a vehicle on the street coming and going from this house for about an hour and a half prior to PALOMO walking towards the house. The door to the house was left wide open, and no cars were parked directly by the house. Based on Affiant's training and experience, Affiant believed that this particular residence may be a stash house being used by PALOMO. Officers set up additional surveillance on the backside of this house. Officers observe PALOMO with another male and observe PALOMO smoking what appeared to be methamphetamine from a large bong in the backyard. Officers observe PALOMO exit this residence wiping off blood from his arm. PALOMO begins walking towards officers, and as officers approach, PALOMO begins walking away from the officers. PALOMO then runs through the apartment complex. He is ultimately detained and found to be in possession of 2.72 grams of cocaine, about 35.96 grams of methamphetamine, and about 24.83 grams of marijuana. These items were found on PALOMO's person and/or his backpack.
8. Agents executed the search warrant at Avondale, PALOMO's residence, and located 2.92 grams of cocaine in a closet.
9. PALOMO, DELEON, and BARBOSA were all provided with and waived their Miranda rights on June 20, 2024. PALOMO, DELEON, and BARBOSA all admitted to the details of the drug trafficking conspiracy detailed above. BARBOSA told officers that while she did make the delivery detailed above, she did it for free and did not know what the substance was. PALOMO, however, indicated that he paid BARBOSA for the delivery and that she knew she was delivering narcotics. PALOMO also admitted to being on parole and

recently cutting off his required GPS device in an attempt to elude and evade law enforcement.

Respectfully Submitted,


DAVID CAMACHO
(Affiliate)

Digitally signed by DAVID
CAMACHO (Affiliate)
Date: 2024.06.21
10:40:55 -05'00'

DAVID CAMACHO

Drug Enforcement Administration
Task Force Officer

Subscribed and sworn to telephonically this the 21st day of June, 2024.


ELIZABETH S. CHESTNEY
U.S. MAGISTRATE JUDGE